

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

STATE OF SOUTH CAROLINA,

SOUTH CAROLINA DEPARTMENT OF  
HEALTH AND ENVIRONMENTAL  
CONTROL,

and

SAVANNAH RIVER MARITIME  
COMMISSION,

Plaintiffs,

v.

UNITED STATES ARMY CORPS OF  
ENGINEERS;

UNITED STATES ARMY CORPS OF  
ENGINEERS, SAVANNAH DISTRICT;

RYAN MCCARTHY, In his official capacity  
as Secretary of the Army;

LT. GENERAL TODD T. SEMONITE, In his  
official capacity as Commanding General and  
Chief of Engineers, U.S. Army Corps Of  
Engineers;

MAJOR GENERAL DIANA M. HOLLAND,  
In her official capacity as Commanding  
General, South Atlantic Division, U.S. Army  
Corps of Engineers;

and

COLONEL DANIEL H. HIBNER, In his  
official capacity as District Engineer, U.S.  
Army Corps of Engineers, Savannah District,

Defendants.

C/A NO.: 1:19-cv-3132-RMG

**Motion in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Paul H.Threlkeld be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- ☒ Prior to filing this Motion, I conferred with opposing counsel who have indicated the following position as to this Motion: ☐will likely oppose; ☒does not intend to oppose
- ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):
- ☐ No duty of consultation is required because the opposing party is proceeding pro se.

Wyche, P.A.  
Firm Name

200 E. Camperdown Way  
Street Address or Post Office Box

Rita Bolt Barker  
Name of Local Counsel

s/ Rita Bolt Barker  
Signature of Local Counsel

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Local Counsel for Intervener-  
Defendant Georgia Ports Authority

District of South Carolina  
Federal I.D. No.: 10566